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11 Mr. Quesada-Valencia

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13 IN THE UNITED STATES DISTRICT COURT
14 FOR THE EASTERN DISTRICT OF CALIFORNIA

15 UNITED STATES OF AMERICA,) Case No. 2:21-cr-00046-JAM
16 Plaintiff,)
17 vs.) **STIPULATION AND ORDER TO CONTINUE**
18 MIGUEL QUESADA-VALENCIA) **STATUS CONFERENCE AND EXCLUDE TIME**
19 Defendant.)
20 _____) Date: May 18, 2021
21) Time: 9:30 a.m.
22) Judge: Hon. John A. Mendez
23)
24)

25 IT IS HEREBY STIPULATED and agreed by and between Acting United States
26 Attorney Phillip A. Talbert, through Assistant United States Attorney Samuel Stefanki, counsel
27 for Plaintiff, and Federal Defender Heather Williams, through Assistant Federal Defender
28 Hootan Baigmohammadi, counsel for Defendant Miguel Quesada-Valencia, that the status
hearing currently set for May 18, 2021 at 9:30 be continued to July 20, 2021 at 9:30 a.m.

29 The parties specifically stipulate as follows:

- 30 1. By previous order, this matter was set for a status on May 18, 2021 at 9:30 a.m.
31 2. By stipulation, Mr. Quesada now moves to continue the status conference to **July**
32 **20, 2021, at 9:30 a.m.**
33 3. The government has represented that the discovery associated with this case
34 includes 535 pages and various audio recordings, which have either been
35 produced to the defense or made available for inspection and copying.

- 1 4. Defense counsel represents that he requires additional time to review the
2 discovery, investigate and research possible defenses, research potential pretrial
3 motions, consult with Mr. Quesada, explore potential resolutions to the case, and
4 otherwise prepare for trial.
- 5 5. Defense counsel believes that failure to grant the requested continuance would
6 deny him the reasonable time necessary for effective preparation, taking into
7 account the exercise of due diligence.
- 8 6. The government does not object to the continuance.
- 9 7. Therefore, the parties stipulate that the ends of justice served by granting the
10 continuance outweighs the best interest of the public and Mr. Quesada in a speedy
11 trial, and request the Court so to find.
- 12 8. For the purpose of computing time under 18 U.S.C. § 3161 *et seq.* (Speedy Trial
13 Act), the parties request that the time period between May 18, 2021 and July 20,
14 2021, inclusive, be deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(B)(iv)
15 (Local Code T4), because it would result from a continuance granted by the Court
16 at the defense's request, based on a finding that the ends of justice served by
17 granting the continuance outweighs the best interest of the public and Mr.
18 Quesada in a speedy trial.

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9 Date: May 14, 2021
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Respectfully submitted,

HEATHER E. WILLIAMS
Federal Defender

/s/ Hootan Baigmoohammadi
HOOTAN BAIGMOHAMMADI
Assistant Federal Defender
Attorneys for Defendant
Mr. Quesada-Valencia

Date: May 14, 2021

PHILLIP A. TALBERT
United States Attorney

/s/ Samuel Stefanki
SAMUEL STEFANKI
Assistant United States Attorney
Attorneys for Plaintiff

ORDER

The Court, having received and considered the parties' stipulation, and good cause appearing therefrom, **ADOPTS** the parties' stipulation in its entirety as its order.

IT IS SO ORDERED.

Dated: May 14, 2021

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ
UNITED STATES DISTRICT COURT JUDGE